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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

LaDawn M. Schmardebeck,)	
)	
Plaintiff,)	CASE NO. 2:20-CV-01022-VCF
)	
v.)	
)	UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO FILE
ANDREW SAUL,)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
_____)	

Plaintiff, LaDawn M. Schmardebeck, by her attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a forty-six day extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed January 18, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. This, combined with the large administrative record (about 800 pgs.) prevents counsel from preparing a proper and meritorious brief. Plaintiff requests this time to allow for review of the dense record and proper preparation of Plaintiff's Brief. Wherefore, Plaintiff requests an extension

1 from January 18, 2021 up to and including March 5, 2021 to file her brief. Counsel for the
2 Plaintiff has conferred with defendant's counsel who kindly doesn't object to this request.

3 Dated this 15th day of January, 2021.

4 Respectfully submitted,

5 /s/Hal Taylor

6 Hal Taylor, Esq.
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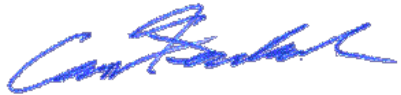
14 **Plaintiff's Certificate of Service:**

15 I certify that I caused the Motion for Extension of Time to be served today, January 15,
16 2021, by CMECF to Blaine Welsh, Esq., who is a filing user of the CMECF system.

17 /s/Hal Taylor

18 Hal Taylor, Esq.

19
20 IT IS SO ORDERED.

21 

22
23 Cam Ferenbach
24 United States Magistrate Judge

25 Dated: 1-19-2021
26 _____
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